

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

IN RE:

MARK A NICHOLLS

CASE #: 19-bk-02414-KSJ

SHELLEY M NICHOLLS

Chapter 13

Debtor(s)

_____/

MOTION TO MODIFY ORDER CONFIRMING CHAPTER 13 PLAN

NOTICE OF OPPORTUNITY TO OBJECT AND FOR HEARING

Pursuant to Local Rule 2002-4, the Court will consider the relief requested in this paper without further notice or hearing unless a party in interest files a response within twenty-one (21) days from the date set forth on the attached proof of service, plus an additional three days for service if any party was served by U.S. Mail.

If you object to the relief requested in this paper, you must file a response with the Clerk of the Court at George C Young Federal Courthouse, 400 W Washington Street, Suite 5100, Orlando, FL 32801, and serve a copy on the movant's attorney, L Todd Budgen, Simple7BK, PLLC, 631 Palm Springs Drive #114, Altamonte Springs, FL 32701 and any other appropriate persons within the time allowed. If you file and serve a response within the time permitted, the Court will either schedule and notify you of a hearing, or consider the response and grant or deny the relief requested without a hearing.

If you do not file a response within the time permitted, the Court will consider that you do not oppose the relief requested in the paper, will proceed to consider the paper without further notice or hearing, and may grant the relief requested.

COME NOW, the Debtors, through the undersigned attorney, and file this Amended Motion to Modify the Order Confirming Chapter 13 Plan.

1. The Debtors are behind on plan payments but wish to continue.

2. A spreadsheet is attached showing a new payment schedule.

WHEREFORE, Debtors, through the undersigned attorney, pray this court to allow for the plan to be modified to allow a reduced payment of \$660.64 in month 9, a skipped payment in month 10, then payments of \$3210.00 for months 11-22, then payments of \$2800 for months 23-60, and such other relief as is just and proper.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing was served on the Chapter 13 Trustee, the US Trustee, each via CM/ECF, the Debtor, all affected parties, and those who have filed claims, including:

All CM/ECF Parties;

And via U.S. Mail to those parties on the mailing matrix attached hereto on or before this March 3, 2020

/s/L Todd Budgen

L Todd Budgen

FL Bar #0296960

Simple7BK, PLLC

631 Palm Springs Drive #114

Altamonte Springs, FL 32701

(407) 613-2200

todd@simple7bk.com

